

COHEN & GREEN

December 27, 2022

Hon. Ona T. Wang
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Wang:

As the Court likely recalls, my firm, with co-counsel, represents Plaintiff in the case above. I write to request an extension of the time to complete discovery. This is the first such request, is made on consent, and comes as the Court anticipated at the initial pretrial conference.

The current end of discovery is December 30, 2022. That date was set as a placeholder, given that the Court divided discovery into two phases pending the motion to dismiss (with *Monell*-only discovery being held off until following the motion). The motion to dismiss is now fully briefed, but briefing has only just finished.

Thus, the parties ask for an additional 90 days for a control date of Thursday, March 30, 2023 for the close of discovery — understanding that, like the initial date, is not necessarily a hard stop given that the motion to dismiss remains pending, and may not be resolved by then.

As always, we thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/ their/ them

COHEN&GREEN P.L.L.C.

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cc:

All relevant parties by electronic filing.